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DATE: March 28, 2012

TO: Kelley Chase, EPA Region 3 OSC
Cynthia Caporale, EPA Region 3 OASQA

THROUGH:

Ex. 4 - CBI

FROM:

SUBJECT: VERIFICATION/COMPLETENESS CHECK – DIMOCK, PA LABORATORY DATA
File 1202005 FINAL PART 3 of 3 R33907 03 20 12 1017.pdf

INTRODUCTION

On March 28, 2012, a review of the case narratives and corresponding certificates of analysis from the EPA R3 (WO1202005 PART 3 Posted Mar 20) was conducted at the SERAS facility in accordance with the Follow-Up Verification/Completeness Check agreed upon during our teleconference on Wednesday 2/8/12.

The assumptions for this review include the following: 1) Case narratives from the Regional labs and/or subcontract labs have been reviewed in accordance with Regional or Environmental Services Assessment Team (ESAT) protocols and contain all pertinent and complete information to conduct the completeness check. SERAS will base this review on the information provided by the laboratory and not on an actual data package; and 2) SERAS will relay any "red" flags to the EPA R3 personnel to resolve and determine data usability.

OBSERVATIONS

In accordance with Table 1 – Field and QC Sampling Summary (Rev01 - 2/3/12), Table 2 – Sample Analytical Requirements Summary (Rev01 – 2/3/12), Methods for Groundwater and Surface Water Samples and the R3 SOPs R3QA108-110811 (anions by IC), R3QA163-110811 (oil & grease), R3QA131-080311 (total mercury), Method 365.4 (total phosphorous), Method 353.2 using flow injection (nitrate/nitrite as nitrogen), R3QA105-110811 (total dissolved solids), Method 353.2 using flow injection (total nitrogen) and R3QA106-110311 (total suspended solids), the following observations were noted and need to be clarified/resolved.

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1. For total nitrogen, the RPD for sample HW55 (lab ID# 1202005-10) exceeded the 20% criterion. Since it cannot be ascertained if all the samples in the batch are sufficiently similar, a "UJ" flag needs to be entered into the result qualifier column for this sample.
2. For oil and grease analyzed under batch BB20707, the LCS, MRL check and the MS recoveries for sample HW59 (lab ID# 1202005-01) and HW03 (lab ID# 1202005-34) were all below the respective acceptance criteria. This reviewer agrees with the lab qualifier of "UJ" assigned to all the samples. Non-detect results for HW27z, HW27, FB16, HW55, HW59, HW11-P, HW11, HW53, HW53-P, FB17, HW57-P, HW58, HW57, HW03, HW03z, FB18 and HW07 should be flagged "UJ" in the result qualifier column.
3. For TDS in Batch BB21606, the RPD for sample HW27 (lab ID# 1202005-08) exceeded the 20% criterion. This reviewer agrees with the "J" flag assigned by the laboratory. Since it cannot be ascertained if all the samples in the batch are sufficiently similar, a "J" flag needs to be entered into the result qualifier column for this sample.
4. For TDS in Batch BB21606, the field blank (FB16) associated with sampling conducted on 2/13/12 exceeded the RL. Since there are no provisions in the National Functional Guidelines for raising the RLs based on field blank contamination, the samples associated with this field blank have been qualified "J" to err on the

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conservative side. A "J" qualifier should be placed in the Scribe result qualifier column for samples HW27z, HW27, HW55, HW11-P, HW11, HW53 and HW53-P.

5. It is assumed that all required instrument QC in the method was run and was within the criteria listed in the EPA R3 SOPs since this information is not available in the laboratory report.

cc:

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